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18 Of Attorneys for Plaintiffs.

19 UNITED STATES DISTRICT COURT
20 DISTRICT OF NEVADA

21 "LILY," *et al.*,

22 Plaintiffs,

23 v.

24 JAN ROUVEN FUECHTENER,

25 Defendant.

NO. 2:19-cv-00352-RFB-EJY

DECLARATION OF JANE DOE IN SUPPORT OF
MOTION FOR APPROVAL OF MINOR
SETTLEMENT RE PIA

HEARING DATE:
TIME:

BEFORE HONORABLE MAGISTRATE JUDGE
ELAYNA J. YOUCHAH
UNITED STATES DISTRICT COURT

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3 I, Jane Doe, hereby declare the following:

4 1. I, Jane Doe, am the mother of the minor plaintiff "Pia" herein and am the person known
5 as "Jane Doe" in this matter. I am the exclusive legal guardian for Pia, appointed by the court in our
6 home jurisdiction. I make this declaration in support of the motion for approval of the proposed
7 settlement of the claims herein.

8 2. My daughter has been represented by Ms. Hepburn and Ms. Bianco since 2016 in
9 matters relating to her rights as a victim of child pornography crimes. Ms. Hepburn, Ms. Bianco and I
10 have discussed the nature of the claims which may be made on her behalf. We have also discussed the
11 processes involved in proceeding to trial with a civil claim.

12 3. I have reviewed the motion and the declarations of Carol L. Hepburn, Deborah Bianco,
13 and John Kawai, supporting the motion to approve the settlement. It is my understanding that each of
14 the plaintiffs including my daughter would receive an equal pro-rata portion of the gross proceeds of
15 the settlement and also be responsible for an equal pro-rata share of the costs of the litigation. I
16 understand that this settlement would provide a gross amount of \$ [REDACTED] gross for seven
17 plaintiffs. This would be \$ [REDACTED] gross amount to each plaintiff including my daughter, fees of \$ [REDACTED]
18 paid to the attorneys, costs to be reimbursed of \$1,368.81, and a net payout to my daughter and to each
19 of the other plaintiffs of \$ [REDACTED]

20 4. I believe that the proposed settlement is a fair and reasonable one in that it provides a
21 certain recovery to each of the plaintiffs in the near term without the expenditure of additional costs
22 for trial and for collection and makes sense in the context of the facts and circumstances of this case.

23 5. I am in agreement with the allocation of one third of the gross recovery for attorneys'
24 fees in this matter. At the outset of my engaging Ms. Hepburn and Ms. Bianco to represent my
25 daughter, I entered into a fee agreement providing for a one third contingency fee together, payable to
26 Ms. Hepburn and Ms. Bianco jointly, with reimbursement of reasonable out of pocket costs which
27 they might expend. I further understand that it was necessary for Ms. Bianco and Ms. Hepburn to
28

1 associate with Mr. Kawai, as local counsel, in order to file this lawsuit, and that Mr. Kawai will be
2 entitled to share in the one-third contingency fee.

3 6. All monies received on behalf of my daughter, Pia, and including any funds coming
4 from the resolution of this case, are placed into an account for her benefit. All funds are used solely
5 for her benefit. I have no objection to placing funds from this action in a blocked account for her
6 benefit that will have no withdrawals without court order until she reaches 18 years old. There is
7 already such an account established for her benefit into which we can place the funds from this case.
8

9 7. I ask on behalf of my daughter, Pia, that the court approve this settlement as proposed
10 in the motion.
11

12 I hereby declare under penalty of perjury under the laws of the United States of America that
13 the foregoing is true and correct to the best of my knowledge.
14

15 DATED this 7 day of October, 2021.

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17 _____
18 Jane Doe as legal guardian and mother of Pia
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